

DeMaria, Eva

From: HeldtSheller, Stephanie <SHeldtSheller@nwpipe.com>
Sent: Monday, October 05, 2015 11:02 AM
To: ORR Jim
Cc: MCCLINCY Matt; poulsen.mike@deq.state.or.us; LIVERMAN Alex; THIESSEN Kenneth; ROMERO Mike; DeMaria, Eva; Sheldrake, Sean; Wray, Mike; 'Ken.Shump@CH2M.com'; Claudia Powers
Subject: RE: 138 NWP Revision of 8/31/2015 DEQ Comments for Source Control Evaluation
Attachments: Page fromORbackgroundMetal.pdf

Hi Jim,

And thank you for the revised comments. The letter states that clarifications are in italics. For revised Specific Comment 4 (second part), we asked for DEQ to please point out the statement in the Report, that triggered this comment. Since that was not provided by the DEQ, we are not sure what the problem is that warranted this DEQ comment. Could you please assist us with the remaining issues below?

Specific Comment 4 (second part) of the DEQ October 1, 2015 revised comments reads as follows:

Section 6.3.1.4 Conclusions for Human Health Risk Screening

Section 6.3.1.3 Human Health Risk Screening Results

Conclusions regarding risks from human exposure to zinc cannot be used as the basis for drawing ecological risk conclusions. Aquatic ecological screening levels for zinc are considerably lower than human health screening levels. Screening should be conducted for both human health and ecological receptors using the appropriate screening values. *The site maximum concentration should be compared with background UPL. This comment will also be addressed in pending No Further Action DEQ comments.*

The issues with this comment are:

- (1) Section 6.3.1.3 does not draw ecological risk conclusions, or discuss aquatic ecological screening levels for zinc. Did you mean to withdraw these statements that are not in italics? Or is there still some issue here that I am missing? If there is an issue, could you please describe what DEQ needs from NWP to satisfy this statement in the comment?
- (2) Section 6.3.1.3 refers to tables 6-9 and 6-10, which already do compare zinc max concentrations, as well as all metals max concentrations, to background UPL's from the "Development of Oregon Background Metals Concentrations in Soil," Table 3, Regional Background Calculations for Metals (attached for your quick reference). Is there something NWP is missing in the tables that DEQ needs in order to satisfy this comment?
- (3) The revised comment states that "This comment will also be addressed in pending No Further Action DEQ comments." When should NWP expect to see the No Further Action DEQ comments?

Once we get these lingering items rectified, NWP will be able to provide DEQ with a timeline as to when our responses and revised pages to the Report will be provided. DEQ timeliness would be appreciated.

Thank you,
Steph.

Stephanie Heldt-Sheller, CHMM

Corporate Environmental Manager

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From: ORR Jim [<mailto:orr.jim@deq.state.or.us>]

Sent: Thursday, October 01, 2015 10:38 AM

To: Wray, Mike; 'Ken.Shump@CH2M.com'; HeldtSheller, Stephanie; Claudia Powers

Cc: MCCLINCY Matt; POULSEN Mike; LIVERMAN Alex; THIESSEN Kenneth; ROMERO Mike; 'DeMaria, Eva'; Sheldrake, Sean

Subject: 138 NWP Revision of 8/31/2015 DEQ Comments for Source Control Evaluation

Attached is a revision to DEQ's 8/31/2015 comments for the NW Pipe Source Control Evaluation.
Please contact me if you have questions.

Thank You

Jim Orr

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